

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

MARK A. FAVORS, et al. )  
                          )  
                          )  
Plaintiffs,           )  
                          )  
v.                     )       No. 1:11-cv-05632-DLI-RR-GEL  
                          )  
                          )  
ANDREW M. CUOMO, et al. )  
                          )  
                          )  
Defendants.           )  
                          )

**DECLARATION OF TODD R. GEREMIA IN SUPPORT  
OF SENATE MAJORITY DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT ON SECTION 2 CLAIMS**

Todd R. Geremia declares pursuant to 28 U.S.C. § 1746:

1. I am a partner at Jones Day, which represents the Senate Majority—New York State Senators Dean G. Skelos and Michael F. Nozzolio, and LATFOR member Welquis R. Lopez—in the above-captioned action. I submit this declaration in support of the Senate Majority Defendants' Motion for Summary Judgment on Section 2 Claims.
2. Attached hereto as Exhibit A are true and correct copies of the *Rodriguez* Plan's and Breitbart Plan's Proposed District 8 Maps, prepared by LATFOR staff.
3. Attached hereto as Exhibit B are true and correct copies of the *Rodriguez* Plan's and Breitbart Plan's Proposed District 8 Maps With Racial Data, prepared by LATFOR staff.
4. Attached hereto as Exhibit C are true and correct copies of excerpts from U.S. Census Bureau, A Compass for Understanding and Using American Community Survey Data (October 2008), available at <http://www.census.gov/acs/www/Downloads/handbooks/ACSGeneralHandbook.pdf>.

5. Attached hereto as Exhibit D is a true and correct copy of a list of the districts located in Bronx County in the Benchmark Plan, the Senate Plan, the Breitbart Plan, the 63-seat Common Cause Plan, and the Unity Plan, along with the percentage of voting-age population and total population of each district that is located in the Bronx, prepared by LATFOR staff.

6. Attached hereto as Exhibit E is a true and correct copy of a chart depicting Bronx and New York City Voting Age Population and Citizen Voting Age Population, prepared by LATFOR staff.

I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Todd R. Geremia

Todd R. Geremia

New York, NY  
June 29, 2012